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Filed by ECF and Email, [dwims@wimslaw.com](mailto:dwims@wimslaw.com)

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1430 Pitkin Avenue, 2nd Floor  
Brooklyn, NY 11233

**Re: *Johnna Ayres v. Robert J. Shiver et al.***  
**Docket: 1:21 CV 0473(ERK)(PK)**

Dear Mr. Wims:

I write to provide you with the Plaintiff's moving papers for Summary Judgment. Please find the following documents attached:

1. Plaintiff's Notice of Motion for Summary Judgment;
2. Plaintiff's Statement of Material Facts;
3. Plaintiff's Memorandum of Law in Support of her Motion for Summary Judgment;
4. Plaintiff's Declaration;
5. Plaintiff's Counsel's Declaration;
6. Plaintiff's Exhibits.

As per our agreed upon briefing schedule, you will serve your Opposing papers on or before July 22, 2022. Our Reply will be served on August 5, 2022.

Please do not hesitate to reach out to me directly should you have any questions. Thank you for your attention to this matter.

Respectfully submitted,

David G. Gabor, DGG 2160521

Cc: Honorable Edward R. Korman, *By ECF*  
Honorable Peggy Kuo, *By ECF*